New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Waste Reduction and Recycling, Room 212
50 Wolf Road, Albany, New York 12233-7253
Phone: (518) 457-6072 FAX: (518) 457-1283

John P. Cahill
Commissioner

AUG 31 1998

Mr. Kurt Meyer
Secretary
Geometric Circuits, Inc.
11 Michael Avenue
Farmingdale, NY 11735

Dear Mr. Meyer:

Re: Biennial Update (BU)
Geometric Circuits, Inc.
EPA ID# NYR082788126

Based on our review of your Biennial Update, received on July 29, 1998, we find that your Update meets the Hazardous Waste Reduction Planning Requirements of Article 27, Section 0908 of the Environmental Conservation Law.

Please submit an Annual Status Report as required by the law on July 1, 1999 on your progress in achieving the time schedule in your update for implementing waste reduction measures identified. The status report must include an update of Table 1 and Table 2, and must be submitted by July 1 for each year that a hazardous waste reduction plan Biennial Update is not submitted.

We encourage you to make pollution prevention an ongoing process, and to look for additional hazardous waste technologies that can be implemented at your facility. The ongoing development and implementation of a waste reduction training program for your facility personnel is an important ingredient for the continued success of your waste reduction program.

If you have any questions, please contact Mr. Juzer Rasani at 518-457-6072.

Sincerely,

Dennis J. Lucia, P. E.
Section Chief
Hazardous Waste Minimization Section

cc: w/inc. - A. Cava, Reg. 1
w/inc. - J. Reidy, EPA Region II

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

HAZARDOUS WASTE REDUCTION PLAN/BIENNIAL UPDATE

FACILITY SUMMARY SHEET

DATE: Ba Accepted 8/31/98

EPA ID #	NYR000788126
COMPANY NAME	Geometric Circuits, Inc.
ADDRESS	11 Michael Av.
CITY	Farmingdale
STATE	N.Y.
ZIPCODE	11735
FACILITY CONTACT	Kurt Meyer
PHONE #	516-249-0230
SIC CODE	3672
REGION (NYS)	1
FINAL HSWA PERMIT EFFECTIVE DATE	
FINAL NYS PART 373 PERMIT EFFECTIVE DATE	

DESCRIPTION OF ORIGINAL PROCESS:

Hazardous Waste water generated due to electroless Copper Plating in the Manufacturing of printed circuit-boards.

DESCRIPTION OF WASTE REDUCTION ACTIVITY:

1) Elimination of tin Stripping

Company Name:	EPA I.D. Number
Geometric Circuits, Inc.	NYR000016220

HAZARDOUS WASTE GENERATION SUMMARY

Table 1

Waste Stream I.D Number	Name of Waste	Source of Generation	Disposal Method	Quantity of Waste Generated (tons)				Indices (lb waste generated /lb product produced)				
				1994	1995	1996	1997	Theo	1994	1995	1996	1997
5	Copper	conc. ball-out	reclaim	31.4	35	39	36	0.48	0.32	0.22	0.27	0.28
6	Copper	ion exchange regen	reclaim	47.5	58	58.1	57.5	0.4	0.48	0.36	0.4	0.41
8	Flux oil	solder dipping	off site blending	-	1.9	1.3	1.5	0.01	—	0.01	0.01	0.01

Company Name: Geometric Circuits, Inc	EPA I.D. Number NYR000016220

HAZARDOUS WASTE REDUCTION PROGRAM

Table 2

Waste Stream I.D. No.	Name of Waste	Waste Stream Affected	Reduction Plans/Projects	Estimated Waste Reduction (Tons)	Method Used to Calculate *ROI	ROI (est)	Goal Date	Remarks
5 & 6	Copper	conc bailout Ion exchange regen.	change to tin etch and full copper plating eliminating of tin plating and tin stripping introduction of closed-loop atmospheric evaporators on copper plating.	20	PP	7 years	3/98	
			Etch - change to 5 chamber cascade rinse and use as made up chemistry					

*ROI = Return on investment
AC = Annualized cost
IRR = Internal rate of return
NPV = Net present value

PP = Pay back period
PI = Profitability index

GRRSUM1

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

02/09/98

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	NYR000016220
FACILITY NAME ->	GEOMETRIC CIRCUITS INC
MAILING ADDRESS ->	11 MICHAEL AVE FARMINGDALE, NY 11735
INSTALLATION ADDRESS ->	11 MICHAEL AVE FARMINGDALE, NY 11735

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

ATTN: AIR & WASTE MANAGEMENT DIVISION, 22ND FL.
HAZARDOUS & SOLID WASTE PROGRAMS BRANCH
RCRA NOTIFICATIONS

TO : MEYER, KURT
SECY TREASURER
GEOMETRIC CIRCUITS INC
11 MICHAEL AVE
FARMINGDALE, NY 11735

Please print or type with ELITE

★★ To avoid delays in processing, please complete all sections. Only original signature of the Generator is acceptable.

Please refer to the *Instructions for Filling Notification* before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only): 98-02-02

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

A. First Notification [ ] B. Subsequent Notification [X] *(Complete item C)*

C. Installation's EPA ID Number: NYR000011620

II. Name of Installation *(Include company and specific site name)*

GEOMETRIC CIRCUITS INC

(Status)

III. Location of Installation Requires Building Number or Latitude and Longitude for processing.

Street: 11 MICHAEL AVENUE

Street (Continued):

City of Town: FARMINGDALE | State: NY | Zip Code: 11735

County Code: 103 | County Name: SUFFOLK

IV. Installation Mailing Address

Street or P.O. Box: SAME

City or Town: | State: | Zip Code:

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: MEYER | *(First)*: KURT

Job Title: SECRETARY/TRESUER | Phone Number *(Area Code and Number)*:

VI. Installation Contact Address SAME

A. Contract Address Location Mailing Other: [ ] [ ] [ ] B. Street or P.O. Box:

City or Town: | State: | Zip Code:

VII. Ownership PROPERTY

A. Name of Installation's Legal Owner: POLME REALTY

Street, P.O. Box, of Route Number: 11 MICHAEL AVE

City or Town: FARMINGDALE | State: NY | Zip Code: 11735

Phone Number *(Area Code and Number)*: 5162490230 | B. Land Type: - | C. Owner Type: P | D. Change of Owner Indicator: Yes [ ] No [X] | (Date Changed) Month Day Year:

From: Jack Hoyt, AWMD, EPA, Region 2, 290 Broadway, 22 Fl.
New York, NY 10007-1866. Tel; (212) 637 4106

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 9-30
GSA No. 0246-EPA-

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes; Refer to instructions)*

A. Hazardous Waste Activity

1. Generator (See instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (200-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)

TRANSPORTER ONLY →

2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. *Other - specify*

[ ]

3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - [ ] 1. Utility Boiler
   - [ ] 2. Industrial Boiler
   - [ ] 3. Industrial Furnace

5. [ ] Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace

3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
   - [ ] a. Transporter
   - [ ] b. Transfer Facility

4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
[ ]	[X]	[ ]	[ ]	[ ] [ ] [ ] [ ]

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
D008					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
ORIGINAL (NO COPY)	IMPORTANT KURT J. MEYER SEC./TRES.	1/29/98

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

EPA Form 8700-12 (Rev. 11-30-93) Previous edition is obsolete.

SW EMW

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

11/20/95

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	NYR000016220
FACILITY NAME ->	GEOMETRIC CIRCUITS INC
MAILING ADDRESS ->	11 MICHAEL AVE FARMINGDALE, NY 11735
INSTALLATION ADDRESS ->	11 MICHAEL AVE FARMINGDALE, NY 11735

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

ATTN: AIR & WASTE MANAGEMENT DIVISION, 22ND FL.
HAZARDOUS & SOLID WASTE PROGRAMS BRANCH
RCRA NOTIFICATIONS

TO : MEYER, KURT
VICE PRES
GEOMETRIC CIRCUITS INC
11 MICHAEL AVE
FARMINGDALE, NY 11735

11/13/95

USEPA Region II
Air & Waste Management
290 Broadway
New York NY 10007-1866
Floor 22

Dear Sir:

Enclosed is an application for an EPA number. Can you please rush this application since this account needs to have this waste picked up immediately.

If you have any further questions, please call me at (516) 842-6311.

Thank you,

Joyce Zimmerman
Office Supervisor

Safety Kleen Corp
60 Seabro Ave
N Amityville, NY 11701

USPO ETP

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[X] A. First Notification [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: NYR000001620

II. Name of Installation *(Include company and specific site name)*

GEOMETRIC CIRCUITS INC

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 11 MICHAEL AVE

Street (continued):

City or Town: FARMINGDALE | State: NY | ZIP Code: 11735-

County Code: | County Name: SUFFOLK

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: SAME

City or Town: | State: | ZIP Code:

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(last)*: MEYER | *(first)*: KURT

Job Title: VICE PRESIDENT | Phone Number *(area code and number)*: 516-249-0230

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location [ ] Mailing [ ] | B. Street or P.O. Box: SAME

City or Town: | State: | ZIP Code:

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: POL-ME REALTY

Street, P.O. Box, or Route Number: 11 MICHAEL AVE

City or Town: FARMINGDALE | State: NY | ZIP Code: 11735-

Phone Number *(area code and number)*: 516-249-0230

B. Land Type | C. Owner Type | D. Change of Owner Indicator: Yes [ ] No [ ] | (Date Changed) Month Day Year

Continue on reverse

Spoke with Joyce 11/15/95 3:05 MC

Call Joyce Zimmerman (516) 842-6311

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

ID – For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [X] b. 100 to 1000 kg/mo (220 – 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1–5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other – specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner – indicate device(s) – Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Markerer
   - [ ] c. Burner – indicate device(s) – Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 – 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxic (D000)	(List specific EPA hazardous waste number(s) for the Toxic contaminant(s))
[X]	[ ]	[ ]	[ ]	D008

B. Listed Hazardous Wastes. (See 40 CFR 261.31 – 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
D008					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
	JOHN POLLINA PRESIDENT	11-10-95

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Claudia Gutierrez

JUL 02 1998

Kurt Meyer
Vice-President of Geometric Circuits
11 Michael Avenue
Farmingdale, New York 11735

Re: EPA ID No. NYD 000 016 220

Dear Mr. Meyer:

Your submittal dated April 23, 1998, in response to the U.S. Environmental Protection Agency's (EPA) RCRA Notice of Violation, has been deemed satisfactory. Your facility has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties.

If you have any questions, direct them to me at (212) 637-4158.

Sincerely,

Claudia J. Gutierrez
Environmental Scientist

Ac 9-0021196—10c

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS
50 WOLF ROAD • ALBANY, NY 12233-7250

HAZARDOUS WASTE REGULATORY FEE INFORMATION

NOTE: Please carefully read the instructions before completing this form.

SECTION I—GENERAL

NAME OF GENERATOR OR TSD FACILITY: GEOMETRIC CIRCUITS , INC.

EPA ID: NYR000011620

FACILITY MAILING ADDRESS: 11 MICHAEL AVENUE

CITY: FARMINGDALE

STATE: NY

ZIP CODE: 11735

LOCATION OF GENERATOR OR FACILITY (If different from above)

CITY:

STATE:

ZIP CODE:

AT LEAST ONE BLOCK MUST BE CHECKED

☒ Generator Only ☐ Treatment. Storage. Disposal (TSD) Facility Only ☐ Generator and TSD (See definitions)

SECTION II—GENERATOR

1. Summarize all hazardous waste totals, in tons, (excluding wastewater) produced at this facility. DO NOT include waste that is exempt from fees (see instructions)

TOTAL HAZARDOUS WASTE (Excluding wastewater) 86 tons

2. Summarize total hazardous wastewater generated, including hazardous wastewater treated by on-site systems. (see instructions)

TOTAL HAZARDOUS WASTEWATER 90 tons

SECTION III—TREATMENT, STORAGE AND DISPOSAL

Complete This Section ONLY If Your Facility is a RCRA Regulated TSD

1. Please check all process units.

☐ Hazardous Waste landfill ☐ Hazardous Waste Incinerator How Many? _____

☐ Hazardous Waste Surface Impoundment

2. Please summarize and convert the total to tons.

TOTAL HAZARDOUS WASTE RECEIVED FROM OFF-SITE _____ tons

3. **For RCRA Regulated TSD process Units:** Summarize all totals and convert the totals to tons.

TOTAL HAZARDOUS WASTE MANAGED THROUGH RCRA REGULATED TSD UNITS _____ tons

4. Amount of hazardous waste stored on-site on December 31, 19 ____ _____ tons

5. Is your facility under post closure care? ☐ Yes ☐ No

SECTION IV—CERTIFICATION

I certify that the information in this form accurately represents the hazardous waste activity at this site during the current year. This activity(ies) may be subject to regulatory fees.

NAME: KURT J. MEYER

TITLE: SEC/TRES

SIGNATURE (Original Only—No Photocopies)

DATE: 1/7/97

CONTACT IF OTHER THAN ABOVE

TELEPHONE NUMBER: ( ) — —

FOR OFFICIAL USE ONLY

THIS FORM MUST BE COMPLETED AND RETURNED TO NYSDEC

N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION

1997 HAZARDOUS WASTE REPORT

FORM IC

IDENTIFICATION AND CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the Hazardous Waste Report booklet before completing this form.

Sec I — SITE NAME AND LOCATION ADDRESS - COMPLETE ITEMS A THROUGH H

A. EPA ID NO. NYR 000 016 220

B. County: SUFFOLK

C. Site/company name: GEOMETRIC CIRCUITS, INC.

D. Has the the name associated with this EPA ID No.changed since 1996? [ ] 1.Yes [X] 2. No

E. Street name and number. If not applicable, enter industrial park, building name or other physical location description: 11 MICHAEL AVENUE

F. City,Town, Village, etc.: FARMINGDALE

G. State: NY

H. Zip Code: 11735 - ____

Sec II — MAILING ADDRESS OF SITE - Instructions, Page 7

A. Is the mailing address the same as the location address in "E" above ?
[X] 1. Yes (skip to section III)
[ ] 2. No (go to box B)

B. Number and street of mailing address:

C. City, Town, Village. etc.:

D. State: ____

E. Zip Code: _____ - ____

Sec III — NAME, TITLE AND TELEPHONE NUMBER OF PERSON WHO SHOULD BE CONTACTED ABOUT THIS REPORT - Instructions, Page 7

A. Last name	First name	M.I.	B. Title:	C. Telephone: Area Code	Phone no.	Ext.
MEYER	KURT	J.	SEC/TRES	516	249-0230	

Sec IV — GENERATOR STATUS - Instructions, Page 8

A. 1997 RCRA generator status - Instructions, Page 8 (check one box below)
[X] 1. LQG [ ] 2. SQG

Sec V — ON SITE WASTE MANAGEMENT STATUS - Instructions, Page 9

A. RCRA permitted or interim status storage: Instructions, Page 9	B. RCRA permitted or interim status treatment, disposal, or recycling: - Instructions, Page 9
1	1

Sec VI — CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Last name	First name	M.I.	Title:	Date Signed: Mo.	Day	Year
MEYER	KURT	J	SEC/TRES	01	06	98

Signature

SITE NAME GEOMETRIC CIRCUITS, INC.

11 MICHAEL AVENUE FARMINGDALE

NEW YORK, 11735

EPA ID NO. NYR 000 016 220

N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION

1997 HAZARDOUS WASTE REPORT

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Read the detailed instructions beginning on page 11 of the Hazardous Waste Report booklet before completing this form.

Sec I

A. Waste description: Instructions, page 12 Corrosive Copper bearing solution derived from Ion exchange treatment of non hazardous wastewater exempt from RCRA permitting.

B. EPA hazardous waste code: Instructions, Page 13: D002

C. New York State hazardous waste code: Instructions, Page 13:

D. SIC code: Page 13: 3672

E. Origin Code: Page 13: 3 — System type: M

F. Source code: Page 14: A75

G. Point of measurement: Page 14: 1

H. Form code: Page 14: B104

I. RCRA Radioactive mixed: Page 14: 2

Sec II

A. Quantity of Hazardous Waste generated in 1997 Instructions, Page 15: 74.3

B. UOM: Instr., Page 15: 2 — Density: ☐ 1. lbs/gal. ☐ 2. sg.

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Instr. Page 15

☒ 1. Yes (continue to On site process system 1)

☐ 2. No (Skip to Sec. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type: Instr., Page 16: M014

Quantity treated, disposed of, or recycled on site in 1997: 78.6

ON-SITE PROCESS SYSTEM 2

On-site process system type: Instr., Page 16: M

Quantity treated, disposed of, or recycled on site in 1997:

Sec III

A. Was any of this waste shipped off site in 1997? Instructions, Page 16

☐ 1. Yes (continue to Box "B")

☒ 2. No (This form is now complete)

	B. EPA ID Number of facility to which waste was shipped: Instr., Page 17	C. System type shipped to: Instr., Page 17	D. Off-Site availability code: Instr. Page 17	E. Total quantity shipped to this facility in 1997: Instr., Page 17
Site 1		M		
Site 2		M		
Site 3		M		

Comments:

SITE NAME GEOMETRIC CIRCUITS, INC.

11 MICHAEL AVENUE FARMINGDALE

NEW YORK, 11735

EPA ID NO. NYR 000 016 220

FORM GM

N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION

1997 HAZARDOUS WASTE REPORT

WASTE GENERATION AND MANAGEMENT

Instructions: Read the detailed instructions beginning on page 11 of the Hazardous Waste Report booklet before completing this form.

Sec I

A. Waste description: Instructions, page 12: Corrosive Copper bearing liquid derived from Ion exchange treatment of non hazardous wastewater.

B. EPA hazardous waste code: Instructions, Page 13: D002

C. New York State hazardous waste code: Instructions, Page 13:

D. SIC code: Page 13: 3672

E. Origin Code: Page 13: 3 — System type: M

F. Source code: Page 14: A75

G. Point of measurement: Page 14: 1

H. Form code: Page 14: B104

I. RCRA Radioactive mixed: Page 14: 2

Sec II

A. Quantity of Hazardous Waste generated in 1997 Instructions, Page 15: 2200.0

B. UOM: Instr., Page 15: 5 — Density: 1.00 — ☐ 1. lbs/gal. ☐ 2. sg.

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Instr. Page 15

☐ 1. Yes (continue to On site process system 1)

☒ 2. No (Skip to Sec. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type: Instr., Page 16: M

Quantity treated, disposed of, or recycled on site in 1997:

ON-SITE PROCESS SYSTEM 2

On-site process system type: Instr., Page 16: M

Quantity treated, disposed of, or recycled on site in 1997:

Sec III

A. Was any of this waste shipped off site in 1997? Instructions, Page 16

☒ 1. Yes (continue to Box "B")

☐ 2. No (This form is now complete)

	B. EPA ID Number of facility to which waste was shipped: Instr., Page 17	C. System type shipped to: Instr., Page 17	D. Off-Site availability code: Instr. Page 17	E. Total quantity shipped to this facility in 1997: Instr., Page 17
Site 1	NYD 082 785 429	M019	1	17050
Site 2	NYD 077 444 263	M019	1	4950
Site 3		M		

Comments:

The solution was shipped off site for electrowinning system overhaul and maintenance.

SITE NAME GEOMETRIC CIRCUITS, INC.

11 MICHAEL AVENUE FARMINGDALE

NEW YORK, 11735

EPA ID NO. NYR 000 016 220

N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION

1997 HAZARDOUS WASTE REPORT

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Read the detailed instructions beginning on page 11 of the Hazardous Waste Report booklet before completing this form.

Sec I

A. Waste description: Instructions, page 12: Flux Oils from Solder Dipping operation.

B. EPA hazardous waste code: Instructions, Page 13: D008

C. New York State hazardous waste code: Instructions, Page 13:

D. SIC code: Page 13: 3672

E. Origin Code: Page 13: 1 — System type: M

F. Source code: Page 14: A29

G. Point of measurement: Page 14: 1

H. Form code: Page 14: B206

I. RCRA Radioactive mixed: Page 14: 2

Sec II

A. Quantity of Hazardous Waste generated in 1997 Instructions, Page 15: 5687.0

B. UOM: Instr., Page 15: 1 — Density: . — ☐ 1. lbs/gal. ☐ 2. sg.

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Instr. Page 15

☐ 1. Yes (continue to On site process system 1)

☒ 2. No (Skip to Sec. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type: Instr., Page 16: M

Quantity treated, disposed of, or recycled on site in 1997: .

ON-SITE PROCESS SYSTEM 2

On-site process system type: Instr., Page 16: M

Quantity treated, disposed of, or recycled on site in 1997: .

Sec III

A. Was any of this waste shipped off site in 1997? Instructions, Page 16

☒ 1. Yes (continue to Box "B")

☐ 2. No (This form is now complete)

	B. EPA ID Number of facility to which waste was shipped: Instr., Page 17	C. System type shipped to: Instr., Page 17	D. Off-Site availability code: Instr. Page 17	E. Total quantity shipped to this facility in 1997: Instr., Page 17
Site 1	NJD 002 182 897	M061	1	5687.0
Site 2		M		.
Site 3		M		.

Comments:

Flux Oil from Hot Air Solder leveling operation.

This is the oil that the printed circuits are coated with and subsequently overflows from the solder wave.

* * * LISTING OF HANDLER IDENTIFICATION DATA * * *

Handler Name / ID / Address	S	O	N	P	Regulated Activities
GEOMETRIC CIRCUITS INC	1	P			SG
NYR000016220 11 MICHAEL AVE, FARMINGDALE					

Low Income and Minority Score: Source:

Mail Address: 11 MICHAEL AVE
FARMINGDALE NY 11735

NOTIF RECEIPT: 11/15/95 CMNTS:

NOTIF CONTACT: KURT MEYER, VICE PRES
(L) 11 MICHAEL AVE
FARMINGDALE NY 11735
PHONE: 516-249-0230

Current Owner: POL-ME REALTY
Address: 11 MICHAEL AVE
FARMINGDALE NY 11735
Phone: 516/249-0230 SQ: 0001 TYPE: P

BRS95 Waste Generated: D002 D008

BRS95 GM SIC Codes: 3672

* * * * * E N D O F R E P O R T * * * * *

RCRA Files, 20PM / ISS

JUL 02 1998

Kurt Meyer
Vice-President of Geometric Circuits
11 Michael Avenue
Farmingdale, New York 11735

Re: EPA ID No. NYD 000 016 220

Dear Mr. Meyer:

Your submittal dated April 23, 1998, in response to the U.S. Environmental Protection Agency's (EPA) RCRA Notice of Violation, has been deemed satisfactory. Your facility has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties.

If you have any questions, direct them to me at (212) 637-4158.

Sincerely,

Claudia J. Gutierrez
Environmental Scientist

GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

4/23/98

Claudia J. Gutierrez
RCRA Compliance Branch
Division Of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency - Region 2
290 Broadway, 22nd Floor
New York, New York 10007

Dear Ms. Gutierrez,

Enclosed please find the documentation required.

1. 6NYCRR 373-1.1(d)(iii)(c)(3): We labeled and identified the area indicating Hazardous Waste.

2. 6NYCRR 373-1.1(d)(1)(iv): All chemicals are stored within Suffolk County Health Departments Article 12. The only time they are not is for shipping and receiving purposes.

3. 6NYCRR 373-1.1(d)(1)(iii): Copy of weekly log sheet is enclosed.

4. 6NYCRR 373-1.1(d)(1)(iii): Copy of training and job description is enclosed.

5. 6NYCRR 373-1.1(d)(1)(iii): Copy of updated contingency plan enclosed.

If there are any problems please do not hesitate to call.

Sincerely,

Kurt Meyer
Secretary
Geometric Circuits, Inc.

Enclosures

11 MICHAEL AVENUE, FARMINGDALE, NEW YORK 11735 • (516) 249-0230 • FAX (516) 249-0286

GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

Contingency Plan Review

Review Date	changes	Yes	No	Signature
4/2/98		✓		

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

This plan is designed to minimize hazards to human health, or the environment.

IMPLEMENTATION

This plan must be put into action in the event of fire, explosion, any unplanned sudden, or non-sudden release of hazardous waste to the air, soil, or surface water.

CONTENT OF THE PLAN

1. List of Emergency Coordinators
2. List of Emergency Equipment
3. Emergency Procedures
4. Building Layout
5. Evacuation Routes
6. Operations Shutdown
7. Head Count - Meeting Point
8. Rescue and Medical Duties
9. Training
10. Warden

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

EMERGENCY COORDINATORS

Primary Emergency Coordinator
JOHN POLLINA, President
8 Ada Lane
East Setauket, NY 11733
(516) 246-5685
30 miles distance from plant

1st Assistant Emergency Coordinator
BOB KAHL
1013 S. Thompson Drive
Bayshore, NY 11706
(516) 665-0834
9 miles distance from plant

2nd Assistant Emergency Coordinator
ROY MASER
15 Burkeland Lane
Hicksville, NY 11801
(516) 822-5278
8 miles distance from plant

Warden

KURT MEYER	(516) 584-6084
JOHN SALVADOR	(516) 789-2328
PHIL CATE	(516) 281-7553

EMERGENCY EQUIPMENT

Alarm System:

For fire and burglary, connected to central station. Fire sensors located on the ceilings in every manufacturing room, storage and boiler room
All doors have magnetic contact sensors
All windows have shade sensors
All hallways have motion sensors.

FIRE EXTINGUISHERS

Type A,B,C Dry chemical located throughout the facility, Fire Pull Alarm (See Floor Plan).

GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

Emergency Procedures

The coordinator shall:

1. Instruct all personnel to their proper stations or exit routes using the PA System.
2. Notify appropriate state or local authorities if necessary.
3. Evaluate the release, quantity, source, and area of extent of the released hazardous material.
4. Evaluate the possibility of hazards to human health or the environment outside the facility.
5. If local evacuation is advisable, contact local authorities and remain available to their assistance.
6. Immediately call the 24 hour Oil and Hazardous Material Spill notification number (518) 457-7362, and the National Response Center 800-424-8802.
   (a) State your name and telephone number.
   (b) State name and location of facility:
   Geometric Circuits, Inc.
   11 Michael Avenue
   Farmingdale, NY 11735
   (516) 249-0230
   (c) Time and type of incident (e.g. fire, explosion)
   (d) State type of material and quantity to extent known
   (e) State injuries, if any
   (f) State your assessment of possibility of hazards to human health, or the environment outside the facility.
7. Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
8. Operations shutdown, instruct designated personnel to disconnect electrical supply, air, water or which ever is necessary for a particular emergency. Only personnel familiar with the operation and utility supply should be used.

GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

Head Count and Meeting Point

All employees, with the exception of the emergency response team and personnel performing shutdown, will meet outside the building in a designated area leaving enough distance to ensure everyone's safety. The meeting point may be at various locations depending on the emergency and location of the emergency. A head count is to be performed by the plant manager as soon as possible to ensure that all persons are accounted for. Any person believed to be missing must be reported at once.

Rescue and Medical Duties

Various types of medical emergencies may arise where immediate treatment is required. This may be the case in chemical burns over the body or a severe cut, where a drench shower, eye wash or first aid kit is used. The person then can be transported by car or ambulance to Brunswick Hospital for treatment. With injuries where movement is not recommended call EMS at once.

Communications

It is important to have adequate lines of communication available for emergencies. This includes the use of internal speaker system for internal use, phone, fire pull alarm, CB or cellular phone for outside communication.

Training

Training for all employees will be conducted and supervised by the Wardens. The discussions will include:

1. Evacuation plans - how to best get out of the building or the area effected.
2. Alarm system - how it functions and the location of detectors and manual activators
3. Meeting point and reporting procedure for personnel.
4. Shutdown procedure - how to go about turning off equipment, power and water.
5. Types of potential emergencies - from small accidental chemical spills to fire and explosion.

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Manufacturers of Printed Circuit Boards

The training will be on an annual basis for all employees, changes to the plan or equipment and process changes may alter the schedule. After the emergency drill differences of the plan should be discussed with all employees. Recommendations will be incorporated and the plan will be updated.

Warden

It is the wardens responsibility to maintain and update the plan, conduct drills and institute training.

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GEOMETRIC CIRCUITS, INC.
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Contingency Plan Training

DATE _____

CLASS INSTRUCTOR _____

	PRINT NAME	SIGNATURE	DEPT.
ATTTENDEES:			

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

Job Description and Training Guidelines

Position: Waste Treatment Technician

Job Description: Daily operation of Waste Treatment System and Monitoring.
Maintaining hazardous waste for removal and loading for removal.

Training Requirements: Operator must be trained in accordance with 6NYCRR Subpart 373-3 (g).

Operator will receive or have had minimum training to adequately perform the job description including training listed in Hazardous Communication Program.

This training will be continued on an annual basis.

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

HAZARD COMMUNICATION PROGRAM

1. Purpose

The purpose of this hazard communication program is to inform Geometric Circuit employees of known hazards that may exist in the workplace.

2. Application

This program applies to chemicals known to be present in the workplace in such a manner that employees may be exposed under normal conditions, non-routine tasks, or foreseeable emergencies.

3. Program Summary

The major elements of this program are as follows:

a) Labels and other forms of warning
b) Material Safety Data Sheets (MSDS) from suppliers
c) Employee information and training
d) list of hazardous chemicals known to be present in the workplace
e) Methods for informing employees of hazards of non-routine tasks
f) Methods for informing contractor employers of hazards their employees may be exposed to while working in the Geometric Circuits plant

4. Labels and Other Forms of Warning

a) Each container of hazardous chemicals shall be labeled, tagged, or otherwise marked with:

1. the identity of the hazardous chemical (or chemicals), and,

2. appropriate hazard warnings

b) Labels and other forms of warning will be legible and in English, and will be prominently displayed or readily available in the work area during each shift.

5. Material Safety Data Sheet

A material safety data sheet (MSDS) will be kept for each hazardous chemical known to be present in the workplace. Material safety data sheets are kept in the cafeteria and are readily accessible by employees during each work shift.

The Plating Department Manager is responsible for maintaining the MSDS in a complete and up-to-date manner.

When work is shipped to customers, copies of MSDS for any known hazardous chemicals include as part of the products shipped will be passed along to the customer.

6. Training & Information

a) Employees shall be trained according to a written hazard communication training plan that is part of the company's overall hazard communication program.

b) Training shall extend to non-routine tasks, as necessary, and to foreseeable emergencies.

c) When contractor employees are required to work in our plant, the contractor employee will be advised of the provisions of our company's hazard communication program. Contractor employees shall be provided ready access to the MSDS and list of hazardous materials.

7. Revisions

This program will be amended as changes in work operations, new materials or processes, or new information dictate.

GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

LIST OF HAZARDOUS CHEMICALS KNOWN TO BE PRESENT

Note: A Material Safety Data Sheets (MSDS) is on file for each substance on this list. Details of specific physical and health hazards as well as protective measures can be found on the MSDS for individual chemicals.

Substance	Supplier/Source	Comments
Sulfuric Acid	Acro Chemical	Plating Dept.
Sodium Persulfate	RonaTech	Plating Dept.
Sodium Hydroxide	Acro Chemical	Plating Dept.
Tin Stripper	Jam Chemical	Plating Dept.
Nitric Acid	Acro Chemical	Plating Dept.
Nickel Sulfate	RonaTech	Plating Dept.
Sodium Hypochloride	RonaTech	Plating Dept.
Hydrogen Peroxide	RonaTech	Plating Dept.
Nickel Carbonate	RonaTech	Plating Dept.
Developer	Morton International	Photo Print
Flux	RFE Industries	Plating Dept.
Sodium Sulfite	VWR	Lab
Ammonium Acetate	VWR	Lab
Methyl Orange	VWR	Lab
Hydrochloric Acid	VWR	Lab
Potassium Permaganate	VWR	Lab
Phosphoric Acid	VWR	Lab
Sodium Hydroxide	VWR	Lab
Gold Salts	Lea Ronal	Plating
Tin Replenisher	Lea Ronal	Plating
Copper Gleam	Lea Ronal	Plating
Pattern Prep 36	Lea Ronal	Plating
Potassium Iodide	VWR	Lab
Sodium Thiosulfate	VWR	Lab
Ethonol Anhydrous	VWR	Lab
PH Buffer Solution	VWR	Lab

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

6NYCRR Subpart 373-3 (g)(iv)

Training and Qualification

Hazardous Waste Management

Name: Jerome Speller, C.E.F Age: 34 yrs old

Qualifications:

1) June, 1987 - 8hr Hazardous Waste Mgt. Applicable To U.S.D.O.T, E.P.A, O.S.H.A, Nassau and Suffolk County (N.y.) Health Codes.
2) July, 1988 - 40 hr Waste Site Worker / Industrial Hygeine Training O.S.H.A 1910.120 (E)(2)
3) Nov. 1991 - June 1992 - Basic and Advanced Electroplating Course.
4) July 1992 - American Electroplaters And Surface Finishers Society (A.E.S.F) Certification as A Certified Electroplater-Finisher (C.E.F). 14 yrs Hazardous Waste Mgt Experience, 9 yrs Electroplating And Surface Finishing Experience, (7 yrs As A Certified Electroplater-Finisher).

Jerome Speller, CEF
Pollution Control Engineer

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GEOMETRIC CIRCUITS, INC.
Manufacturers of Printed Circuit Boards

6NYCRR Subpart 373-3 (g)(iv)

Training and Qualification

Hazardous Waste Management

Name: Jerome Speller, CEF Age: 34

Qualifications: Cont. from page 1

October 1994 NYSDEC Treatment of Electroplating and Metal finishing Wastes 15.5 Contact hrs.

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6 NYCRR 373-1.1(d)(1)(iii):373-3.9(e)
Chemical Container and Storage Area Inspection Log

Inspect Weekly

Inspect Containers for damage or leaks. Inspect containment area for deteriation.

Date	Container Leaks	Containment Det.	Comments	Inspected By (Print)	Signature

MAR 11 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kurt Meyer
Vice-President
Geometric Circuits, Inc.
11 Michael Avenue
Farmingdale, New York 11735

Re: **Notice of Violation**
Geometric Circuits
EPA I.D. No. NYD 000 016 220

Dear Mr. Meyer:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901, 6928.

Pursuant to RCRA, as amended by HSWA, the U. S. Environmental Protection Agency (EPA) promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 C.F.R. Parts 260-272.

For the purposes of this Notice of Violation, the hazardous waste regulations governing the generation of hazardous waste were promulgated in 1980 and amended by HSWA in 1984.

The State of New York is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926 and is authorized to enforce RCRA. EPA has retained its authority to enforce the hazardous waste rules and regulations in the State of New York.

On or about **November 11, 1995**, EPA received notification from Geometric Circuits that it conducts a business involving hazardous waste activity, in particular, the generation of hazardous waste at its facility in Farmingdale, New York. From a review of manifests, it has been determined that the facility generated over 1000 kilograms of hazardous waste per month and is therefore a Large Quantity Generator (LQG).

On or about **January 21, 1998**, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, a duly authorized representative of EPA conducted a RCRA Hazardous Waste Compliance Evaluation Inspection (CEI) of Geometric Circuits Inc. As a result of the CEI (inspection checklist is attached), the following violations of the RCRA regulations were found.

1. 6 NYCRR 373-1.1(d)(iii)(C)(3): requires that an area used to accumulate Hazardous Waste must be identified by a label or sign stating Hazardous Waste. Geometric Circuit Inc. failed to mark the area used to accumulate Hazardous Waste with a label or sign stating Hazardous Waste. This is a violation of 6 NYCRR 373-1.1(d)(iii)(C)(3).

2. 6 NYCRR 373-1.1(d)(1)(iv): This requires that Large Quantity Generators (LQGs) of hazardous waste located in an area of an Aquifer System storing 185 gallons of liquid hazardous waste, must maintain any container storage areas within a secondary containment system designed and operated in accordance with 373-2.9(f). Geometric respondent's failure to maintain the facility's container storage areas within a secondary containment system meeting the requirements of 373-2.9(f) constitutes a violation of 6 NYCRR 373-1.1(d)(iv): 373-2.9(f).

3. 6 NYCRR 373-1.1(d)(1)(iii): 373-3.9(e) states that at least weekly, a Large Quantity Generator (LQG) must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion and other factors. Geometric Circuit Inc.'s failure to conduct weekly inspections of the container storage areas, as required in 373-3.9(e), is a violation of 6 NYCRR 373-1.1(d)(1)(iii) 373-3.9(e).

4. 6 NYCRR 373-1.1(d)(1)(iii): 373-3.2(g) states that a Large Quantity Generator (LQG), must conduct training and maintain training documents and records of personnel at a facility handling hazardous waste which complies with this part (the "training program"). The owner or operator must ensure that the training program includes all the elements described in the document required under 6 NYCRR 373-3.2(g). Geometric Circuits Inc.'s failure to provide training and maintain documents and records of personnel that handle hazardous waste, as required in 373-3.2(g), is a violation of 6 NYCRR 373-1.1(d)(1)(iii) 373-3.2(g).

5. 6 NYCRR 373-1.1(d)(1)(iii): 373-3.4(e) require a Large Quantity Generator (LQG) to have a contingency plan for the facility. The contingency plan must be updated if any changes occur as detailed in 6 NYCRR 373-3.4(e). Geometric Circuits Inc.'s failure to indicate the phone numbers and names of the actual people on call for an emergency, indicates that the contingency plan was not updated. This is a violation of 6 NYCRR 373-1.1(d)(1)(iii): 373-3.4(e).

If you have not already done so, you must take immediate action to correct the violations described above. Please submit, within thirty (30) days of the receipt of this correspondence, a response which includes **[1]** a description of the actions you have taken to correct the violations noted above, and **[2]** documentation that the violations have been corrected. Please submit the documentation required to:

Claudia J. Gutierrez
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency - Region 2
290 Broadway, 22nd Floor
New York, New York 10007

Failure to comply and submit the documentation requested in this Notice of Violation may subject you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Claudia Gutierrez at (212) 637-4158.

Sincerely yours,

George C. Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: Salvatore Carlomagno, Supervisor
Hazardous Waste Compliance Section
New York State Department of Environmental Conservation

bcc: Marianna Dominguez, HWCS
Claudia Gutierrez, HWCS

RCRA Inspection Report
Geometric Circuits Inc.
11 Michael Avenue
Farmingdale, NY 11735
Telephone 516.249.0230

Vice-President/Owner:	Kurt J. Meyer
Senior Inspector:	Mariana Dominguez
Trainee:	Claudia Gutierrez
Date:	January 21, 1998
EPA Handler ID #:	NYR 000 016 220
Reason for Inspection:	Sole Source Aquifer Initiative
Type of Inspection:	Compliance Evaluation Inspection

Background:
This facility is a manufacture of printed circuit boards. There are two types of boards they manufacture: Double sided and Multi-Layer boards. They currently employ approximately 20 people. The property is located in a one story building in an Industrial Park of Farmingdale. Geometric Circuits is the current owner of the facility. They are listed as a RCRA Large Quantity Generator (LQG). The facility generates approximately 25,000 lbs. yearly. This facility was inspected as part of the Sole Source Aquifer Initiative.

Facility Operations
Geometric Circuits has been in operation since 1967. First, it was operating in West Babylon under ID No. NYD 082 788 126. They manufacture printed circuit boards with one P C Board source for the company's prototype, pilot and production requirements. Because of the use of one prototype, the process steps are the same for all circuit board requirements. This ability to produce prototype and production in the same facility through the same process steps allows for a smooth transition from prototype production. The currently have an advance computerized system, including US Robotics Hardware at a modem of 14,000 baud rate. Their board drilling operations is Pluritec Multi station which is a totally automatic drilling system with loading and unloading capabilities. Four modules can run different or the same jobs. This equipment is found high in accuracy and repeatability. Their fabrication equipment includes: multiple driller routers, a semi-automatic beveler, an edge trimmer/beveler, a punch press-80 (metric) ton capacity with nitrogen stripper and circuit board cleaner. Their Graphics Department consists of all necessary equipment to run images including an UV exposing unit which does not use silver emulsion to meet environmental requirements. Plating is conducted and they have the following equipment: one semi-automatic hoist, one somaca dryer, one TNT computerized automatic copper and tin line, one automatic nickel gold tab plated with loader and unloader, one inline resin stripper, etcher and tin stripper, one post washer, one chemcut conveyorized chemical cleaning system, one atomic absorption spectrophotometer and one depp tank nickel-gold line. Furthermore, they have a Computer Aided Design and a Quality Control department with all the equipment necessary for their operations.

Hazardous Waste Generation
There are two different types of hazardous waste generation at this facility. The following applies:

- **D002-** At this facility, they do electroplating and etching as part of their daily activities. During this process, an ammonia base solution and or ammonia hydrochloride are used. The 1997 quantities of this waste amount to 20,000 lbs., (based on NYS Manifest Information).

- **D008 -** At this facility, this waste is generated through the use of lead and copper in the manufacturing of the circuit boards. It was estimated that for 1997, this waste amounted to 5,600 lbs., (NYS Manifest).

Document Review

Some deficiencies were found when we reviewed all documents. There were no training records available at the facility. The contingency plans available did not have all the contacts and phone numbers properly updated. The names that were on the list, were not the people that were on call if an emergency occurred.

Interview

An opening conference was held between Mr. Meyer and us. We discussed the generator requirements under RCRA, the facility operations, and the nature of our inspection. At this point the we were taken on a short facility tour by Mr. Meyer. This tour was followed by a closing interview, explaining our findings in general. Furthermore, a multi-media checklist was filled out.

Tour of the Facility

Upon reviewing the data, Mr. Meyer gave us a tour of the facility. While touring the facility, we observed there was no "Hazardous Waste" labeled area. Furthermore, there was no secondary containment for the Hazardous Waste area. While touring the facility, we did not observe any tanks or containers containing hazardous waste in the storage area or throughout the facility. The company stores hazardous waste in containers prior to shipment for off-site treatment disposal. According to the manifest data, the waste had been picked up two days prior to the inspection.

Violations

The following specific violations and concerns were noted during the inspection:

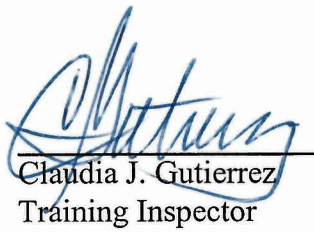
- No labeling of storage area as "Hazardous Waste Storage Area" as per NYCRR Part 373-1.1(iii)(c)(3).
- No Secondary containment for the "Hazardous Waste Storage Area" as per NYCRR Part 373-1.1(d)(iv): 373-2.9(f).
- No weekly inspections for the area of "Hazardous Waste" as per 6 NYCRR 373-3.9(e).
- No Personnel training records as per 6 NYCRR 373-3.2(g).
- Contingency Plan not updated as per 6 NYCRR 373-3.9(e).

Recommendations

A notice of violation will be sent to the owner of the facility.

Attachments:

RCRIS report on facility, NY State manifest listing, Multimedia Checklist, Notice of Violation, and referral to the Air Compliance Branch.



Claudia J. Gutierrez
Training Inspector

3/5/98
Date

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47-15-14 (3/95)

Region: 1

INSPECTION FORM

CESQG
SQG
GENERATOR ✓
TSDF
OTHER
UNANNOUNCED ✓
ANNOUNCED

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for: Commissioner
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Send to: NYSDEC
Division of Hazardous Substances Regulation
Compliance Inspection Section
50 Wolf Road - Room 436
Albany, New York 12233-7253

EPA I.D. NUMBER: NYD 001016220

COMPANY NAME (Corporate): GEOMETRIC CIRCUITS INC.

(Division): _____

COMPANY MAILING ADDRESS: 11 MICHAEL AVENUE

_____

City & State FARMINGDALE, NY Zip Code 11735

COMPANY LOCATION ADDRESS: SAME AS ABOVE

(if different than mailing) _____

City & State _____, NY Zip Code _____

COMPANY TELEPHONE NUMBER: (516) 249-0230 Extension _____

FULL NAME OF COMPANY CONTACT: KURT J. MEYER

TITLE OF COMPANY CONTACT: VICE-PRESIDENT

INSPECTION DATE: 01/21/1998 TIME OF INSPECTION: ___(a.m.) 1:00(p.m.)

INSPECTOR'S NAME: MARIANNA Dominguez

NAME: Claudia J. Gutierrez

REPORT PREPARED BY: Claudia J. Gutierrez DATE: _____

REPORT APPROVED BY: _____ DATE: _____

TABLE OF CONTENTS

APPENDICES

Part I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371

	Yes	No
A. Facility generates and/or stores hazardous waste on-site.	✓	

(1) ✓ Company filed a RCRA hazardous waste notification and/or Part A of RCRA permit application.

(2) ✓ Company has used knowledge of the hazardous characteristic of the waste to determine if it is hazardous.

(3) ✓ Testing has shown characteristics of:

( ) Ignitability (D001) - 371.3(b)
(✓) Corrosivity (D002) - 371.3(c)
( ) Reactivity (D003) - 371.3(d)
(✓) Toxicity (D004 - 043) - 371.3(e)

(4) ___ The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).

(5) ___ The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).

(6) ___ The material is listed in the regulations as an acute hazardous waste (P-Waste). 371.4(d)(5).

(7) ___ The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).

(8) ___ The material is listed in the regulations as a waste containing PCBs (B-Waste). 371.4(e).

B. The company notified EPA as a:

LARGE QUANTITY GENERATOR

Has EPA or DEC officially modified the company's status? Yes ___ No ✓
If yes, attach correspondence.

C. If the facility is a treatment, storage or disposal facility, have they: NO

___ Submitted a Part A application.

___ Should the Part A be modified by the Company? If so, explain.

_____

___ Submitted a Part 373 permit application.

___ Been granted a Part B permit.* expiration date: _____

___ Been granted a Part 373 permit or operating under SAPA with a Part 360 permit.* expiration date: _____

*Complete Appendix C - indicate compliance status with permit conditions.

D. ___ Is the facility operating under a consent order?** NO

___ Have they signed a consent order to resolve violations found during a previous inspection?**

**Complete Appendix D and indicate compliance with each condition of the order.

2. Exemptions

A. Generator Exemptions N/A

(1) ___ Not a regulated handler because:

(a) ___ Never generated any hazardous waste.

(b) ___ No hazardous waste generated within the last 3 years.

(c) ___ Company moved in _____ (date) to _____ (location).

(d) ___ Company out-of-business.

(e) ___ Company sold to _____ (new owner).

(2) ___ Samples collected for testing - 372.1(e)(5).

(3) ___ Residues of hazardous waste in empty containers - 372.1(e)(6).

(4) ___ A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment,

or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials - 372.1(e)(7)(i).

B. TSD Exemptions

(1) ✓ Storage of hazardous waste that is generated on-site in containers or tanks for a period not exceeding 90 days. Other than the storage of liquid hazardous waste over the designated sole source aquifers - 373-1.1(d)(1)(iii).

(2) ✓ Storage in containers or tanks of liquid hazardous waste generated on-site over the designated sole source aquifers for a period not exceeding 90 days. These storage areas must comply with the requirements of this exemption whenever any quantity of liquid hazardous waste is stored in tanks, or whenever the total quantity of liquid hazardous waste stored on-site in containers exceeds 185 gallons - 373-1.1(d)(1)(iv).

(3) ___ The on-site storage and treatment of hazardous waste by generators that generate less than 100 kilograms of hazardous waste in any calendar month and store less than 1,000 kilograms. The conditionally exempt small quantity generator requirements listed in subdivision 371.1(f) of this Title remain applicable. If at any time the amount of hazardous waste exceeds 1,000 kilograms, this exemption does not apply. This exemption applies to the on-site storage and treatment of acute hazardous wastes only if the generator generates and stores in any calendar month such acute hazardous waste in quantities less than those listed in 373-1.1(d)(1)(i)(b) of this paragraph - 373-1.1(d)(1)(v).

(4) ___ The storage and recycling of the recyclable materials identified in subparagraphs 371.1(g)(1)(iii) and (iv) of this Title - 373-1.1(d)(1)(vi).

(5) ___ The storage of the following recyclable materials is exempt from permitting provided that Subpart 374-1 is complied with. (NOTE: Subpart 374-1 will require that the facility also complies with selected sections of this Part.) - 373-1.1(d)(1)(vii):

(a) ___ recyclable materials used in a manner constituting disposal (see section 374-1.3);

(b) ___ hazardous wastes burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Title (see section 374-1.8);

(c) ___ recyclable materials from which precious metals are reclaimed (see section 374-1.6);

(d) ___ spent lead-acid batteries that are being reclaimed (see section 374-1.7).

(6) ___ The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 372.4(b) (use of manifest system), 372.4(d)(1) (manifest discrepancies) and

clause 373-1.1(d)(1)(viii)(d) are complied with. (Storage of hazardous waste prior to recycling is not exempt under this subparagraph.) In addition: 373-1.1(d)(1)(viii):

(a) ___ This exemption is available to:

(1) ___ Commercial facilities that reclaim precious metals, as defined in 374-1.6 of this Title;

(2) ___ Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.

(b) ___ This exemption is not available to any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.

(c) ___ Exempted processes that recycle the hazardous wastes listed in 2B(5)(a-d) must comply with Part 374 of this Title in lieu of the requirements specified in this subparagraph. (Note: Part 374 will require that the facility also complies with selected sections of this Part.)

(d) ___ Owners or operators of facilities subject to RCRA permitting requirements with hazardous waste management units that recycle hazardous waste are subject to the requirements of sections 373-2.27, 373-2.28, 373-3.27 and 373-3.28 of this Part.

(7) ___ The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) and Part 372.2(c)(4). Any treatment or placement of hazardous waste in a manner that constitutes land disposal, as defined in subdivision 370.2(b), does not qualify for this exemption - 373-1.1(d)(1)(ix).

(8) ___ Totally enclosed treatment facility - 373-1.1(d)(1)(xi).

(9)___ Elementary neutralization units or wastewater treatment units, as defined in Part 370 of this Title, other than units that are part of commercial hazardous waste management facilities as defined in Part 370 of this Title. Elementary neutralization units and wastewater treatment units located at commercial hazardous waste management facilities that are only used to neutralize or treat hazardous waste resulting from the recycling of hazardous wastes or from the reclamation of precious metals from hazardous wastes are also exempt. Elementary neutralization units and wastewater treatment units that are used to commercially neutralize or treat hazardous wastes, generated only at geographically continuous sites, and transported via dedicated pipeline are also exempt - 373-1.1(d)(1)(xii).

(10)___ Accumulation areas are exempt, provided that they are used to accumulate waste in accordance with the requirements of subparagraph 372.2(a)(8)(i) of this Title - 373-1.1(d)(1)(xiv).

(11)___ A transporter storing manifested shipments of hazardous waste in containers meeting the requirements of paragraph 372.2(a)(4) of this Title at a transfer facility for a period of ten calendar days or less is exempt, provided that the transfer facility is not located on the site of any commercial hazardous waste treatment, storage or disposal facility subject to permitting under this Part. Complete Part VII - 373-1.1(d)(1)(xi).

3. Hazardous Waste Generation/Treatment/Storage/Disposal

A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. [Do not include hazardous waste treatment processes.]

Manufacturer of printed circuit boards multi layer and double sided

B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or non-exempt). Include process diagrams if available.

SEE INSPECTION REPORT

C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size of containers or tanks used and their location in the storage area. (Be as specific as possible.)

(1) Accumulation Areas [NOTE: Waste in accumulation areas must be included as part of the total quantity of waste on-site]:

NO WASTE ON SITE AT THE TIME OF THE INSPECTION

(2) Container Storage Areas for CESQG, SQG or Generator*

"NONE"

(3) Tank Storage Areas for CESQG,SQG or Generator*

"NONE"

* CESQG - unlimited storage time provided less than 1,000 kg is stored on-site.

SQG - 180 days (or 270 if TSD is over 200 miles away) and less than 6,000 kg is stored on-site.

Generator - 90 days or less storage.

(4) Interim Status/Permitted Container Storage Areas:

GENERATOR

(5) Interim Status/Permitted Tank Storage Areas:

(6) Any other treatment, storage or disposal units such as lagoons, surface impoundments, landfills, waste piles, incinerators, energy recovery units, or underground injection units:

N/A

4. Status Identification:

A. Generator Status

(1) ___ Conditionally Exempt Small Quantity Generator (CESQG) - generates less than 100 kg/mo of non-acute hazardous waste or 1 kg/mo of acute hazardous waste. Complete Part III - 372.1(f)(6), 371.1(f)(7).

(2) ___ Small Quantity Generator (SQG) - generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous, and accumulates no more than 6,000 kg of non-acute hazardous waste on-site. Complete Part IV - 372.2(a)(8)(iii).

(3) ✓ Generator - generates more than 1,000 kg/mo of non-acute hazardous waste or generates more than 1 kg of acute hazardous waste in a calendar month. Complete Part V - 372.2(a)(8)(ii).

B. Treatment, Storage or Disposal Facility (TSDF)

(1) ___ Hazardous waste is stored greater than 90 days.*,**

(2) ___ Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored.*

(3) ___ Hazardous waste is treated on-site in non-exempt units.*

(4) ___ Hazardous waste is disposed of on-site.*

* (If checked Complete Part VI and/or appropriate Appendices)
** (Do not complete for generators only that have exceeded the 90 day storage limit.)

C. Transporter Status

Yes ___ No ✓ Hazardous waste is transported by this company.

If Yes, Complete Part VII Permit No. _____

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 1, 2016 - 11:56 AM

Version 5.0

User Selection Criteria

Location:	New York, all activities	Activity Location:	None Chosen
Handler ID:	NYR000016220	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 04/01/2016		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 5 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:	cme_foia.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	June 2006
Last Updated:	May 2012
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 1, 2016 - 11:56 AM

GEOMETRIC CIRCUITS INC

County Name / Code: NASSAU / NY059

NYR000016220

REGION 02

Location: 11 MICHAEL AVE; FARMINGDALE, NY 11735

Mailing: 11 MICHAEL AVE; FARMINGDALE, NY 11735

Activity Location: NY | State District: NYSDEC R1 | Accessibility: | Non-Notifier: | Extract Flag: Y | Active Site: Y

Generator:	CEG	Transporter:	N	Operating TSDF:	------	IC In Place:	N
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	N	HSM:	N
Full Enforcement:	------	Converter:	------	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N
CA Wrkld:	N	State TSDF:	--------	State Addressed SNC:	N	EPA Addressed SNC:	N
Active State Gen:	N			State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N

EI Indicator (HE / GW): N / N

Subpart K: ----

Violation: Activity Location: NY | Type: 262.A | Determined Date: 01/21/1998 | Determined by Agency: EPA | Responsible Agency: EPA

Scheduled Compliance Date: | Actual Compliance Date: 07/02/1998 | RTC Qualifier: OBSERVED | Sequence Number: 1

Former Citation - FR - 40 cfr 260-272

CEI Evaluation 01/21/1998 | Activity Location: NY | By: EPA | Identifier: 000 | Person: R2CJG | Branch: RCB | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

No Linked Enforcements

Violation: Activity Location: NY | Type: 262.A | Determined Date: 09/19/1996 | Determined by Agency: State | Responsible Agency: State

Scheduled Compliance Date: 10/19/1996 | Actual Compliance Date: 10/01/1996 | RTC Qualifier: OBSERVED | Sequence Number: 1

CEI Evaluation 09/10/1996 | Activity Location: NY | By: State | Identifier: 000 | Person: NYTJN | Branch: R1 | Found Violation: YES

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 09/19/1996 | Identifier: 000

Docket: | Agency: State | Responsible Person: NYTJN | Branch: R1

CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation 06/18/2008 | Activity Location: NY | By: State | Identifier: 001 | Person: NYAPL | Branch: R1 | Found Violation: NO

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: 06/18/2008 | Focus Area:

CEI Evaluation 02/11/2003 | Activity Location: NY | By: State | Identifier: 001 | Person: NYKMY | Branch: R1 | Found Violation: NO

Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Orphan Enforcement Actions:

Enforcement: Activity Location: NY | Type: 120 | Action Date: 03/11/1998 | Identifier: 000

Docket: | Agency: EPA | Responsible Person: R2CJG | Branch: RCB

CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

* Note: Penalty amount may not reflect all violations cited.

Total Number of Handlers:	1
Total Number of Activity Locations:	1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 1, 2016 - 11:56 AM

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 1, 2016 - 11:56 AM

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):

Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:

Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.